

**THE PUBLIC ADVOCATES OFFICE DATA REQUEST:
CALADVOCATES-SDGE-2022 WMP-12
SDG&E RESPONSE**

Date Received: March 22, 2022

Date Submitted: March 24, 2022

I. GENERAL OBJECTIONS

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.

2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.

3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.

4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.

5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.

6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.

7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.

8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.

9. SDG&E objects generally to each request to the extent that the request would impose an

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undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order.

II. EXPRESS RESERVATIONS

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.
2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.
3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.
4. These responses are made solely for the purpose of this proceeding and for no other purpose.

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III. RESPONSES

QUESTION 1

In section 7.3.5.7 of SDG&E’s 2022 WMP, titled “Remote sensing inspections of vegetation around distribution electric lines and equipment” (p. 292), SDG&E states, In Quarter 3 the SDG&E Innovation Team completed the Final Readout on the LiDAR PoC for developing an enterprise-wide solution in its use of LiDAR and AI. This readout summarized analysis outcomes for vegetation clearance. Following the readout, the team collaborated with others to plan and frame the scaling of a solution to support storage, analysis, and visualization of critical LiDAR data. ... Enhancements in 2022 will include ... Engage with other IOUs on their use and integration of remote sensing technologies within their vegetation management programs.

- a) Please clarify in detail what engaging with other IOUs, in the context of the quote above, means.
- b) Does SDG&E share data or images with other IOUs to help develop AI for remote sensing inspections of vegetation around distribution electric lines and equipment?
- c) Does SDG&E use shared data or images from other IOUs to help develop its AI for remote sensing inspections of vegetation around distribution electric lines and equipment?

RESPONSE 1

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, and 5. Subject to the foregoing objections, SDG&E responds as follows:

- a) SDG&E has had informal discussions with the other IOUs to gauge their use of LiDAR within their respective vegetation management programs. Vegetation Management is still determining the efficacy and potential integration of this technology, and how it may be operationalized to bring incremental value to its program. SDG&E has plans to perform LiDAR inspections of vegetation for approximately 730 circuit miles in 2022 to gain further experience with the technology. The table below lists the recent dates of discussion between SDG&E and SCE regarding LiDAR.

Meeting Name	Attendees	Date	Info Sharing
LiDAR Discussion with SDGE	SCE, SDGE	12-13-2021	Yes: Specific to VM data acquisition approaches, data analysis performed,

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			how is utilization of data analysis operationalized; no specific data sharing
LiDAR Veg Mgmt Discussion with SCE	SCE, SDGE	1-18-2022	Yes: Specific to VM data acquisition approaches, data analysis performed, how is utilization of data analysis operationalized; no specific data sharing
SDG&E/SCE Drone Inspection Benchmarking	SCE, SDGE	2-3-2022	Yes: Comparison of operations current and planned activities between SCE and SDGE primarily on asset inspections, but there was discussion on LiDAR acquisition capabilities

b) SDG&E has not shared specific LiDAR data or images with the other IOUs.

c) SDG&E has not used specific LiDAR data or images from the other IOUs.

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QUESTION 2

In section 7.3.5.16 of SDG&E’s 2022 WMP, titled “Removal and remediation of trees with strike potential to electric lines and equipment” (p. 300), SDG&E states, As part of its tree removal/replacement program and it’s “Right Tree, Right Place” initiative, SDG&E continues to offer customers replacement trees that are compatible to plant near power lines. Beginning in 2021, tree planting initiatives were expanded with a goal to plant and distribute 10,000 trees annually to promote sustainability and mitigate the impacts of climate change. SDG&E engaged its pre-inspection contractor to manage its tree planting initiative including more effective customer outreach and engagement, proper species selection, tracking tree health, and quantifying environmental benefits.

- a) Please explain what is meant by “trees that are compatible to plant near power lines” in the above quote.
- b) Please identify the replacement trees species that SDG&E offer its customers in its tree removal/replacement program.
- c) Please explain whether SDG&E plants trees, seedlings, or tree seeds in its tree removal/replacement program
- d) With reference to the “goal to plant and distribute 10,000 trees” noted above, how many trees did you actually plant or distribute in 2021?
- e) Please disaggregate the response to part (d) into:
 - i. Trees or seedlings that you planted
 - ii. Trees or seedlings that you distributed to customers.
- f) Please state SDG&E’s costs “to plant and distribute 10,000 trees” in 2021 referenced above.
- g) Please provide SDG&E’s anticipated costs “to plant and distribute 10,000 trees” in 2022 referenced above.
- h) Please state the number of trees SDG&E planted in 2021 in HFTD Tier 3.
- i) Please state the number of trees SDG&E planted in 2021 in HFTD Tier 2.
- j) Please state the number of trees SDG&E planted in 2021 in Non-HFTD.
- k) Please state the number of trees SDG&E plans to plant in 2022 in HFTD Tier 3.
- l) Please state the number of trees SDG&E plans to plant in 2022 in HFTD Tier 2.
- m) Please state the number of trees SDG&E plans to plant in 2022 in Non-HFTD.

RESPONSE 2

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, and 6. Subject to the foregoing objections, SDG&E responds as follows:

- a) Trees that are compatible to plant near power lines include species whose mature, maximum height above ground is not tall enough to impact the power lines.

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Generally, ten (10) radial feet of clearance is a safe distance from high voltage power lines. Therefore, trees whose mature height is 15-20 feet can be considered compatible to plant near power lines.

- b) SDG&E provides a list of suggested compatible, replacement species in its website at: <https://www.sdge.com/safety/tree-planting-guide>

- c) The size of trees SDG&E provides as part of its removal/replacement program may include: 4-inch, 1-gallon, 5-gallon, 15-gallon, and 24-inch box.

- d) SDG&E planted and distributed 11,856 trees in 2021. “Planted” trees includes those that were planted with SDG&E’s direct involvement during Arbor Day and city events, trees planted near SDG&E facilities such as substations and transmission corridors, and those trees planted by SDG&E’s vendor, *Urban Corps of San Diego*, to replace trees removed within the City of San Diego. “Distributed” trees include those provided to customers as removal/replacements, community outreach events, tribal lands, County parks, Caltrans, HOAs, etc. SDG&E participated in multiple community outreach and wildfire awareness events within the HFTD in the spring and summer of 2021 and provided over 2,000 tree seedlings to customers in total at these events. SDG&E consulted with many of the recipients of distributed trees to ensure proper species selection, plant site specification, and irrigation.

- e)

Trees Planted	324
Trees Distributed	11,532

- f) The cost to plant and distribute trees in 2021 was \$784,454.84.

- g) SDG&E’s anticipated costs to plant and distribute trees in 2022 is \$984,000.00.

- h) The number of trees SDG&E planted in 2021 in HFTD Tier 3 was zero

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- i) The number of trees SDG&E planted in 2021 in HFTD Tier 2 was 85

- j) The number of trees SDG&E planted in 2021 in Non-HFTD was 239

- k) SDG&E's planting locations are dependent on external collaborative relationships and planning that are not yet scoped and specified for the remainder of 2022. As such, SDG&E has not yet determined a planned total number of trees to plant in 2022 within HFTD Tier 3. SDG&E does plan to participate in community outreach and wildfire awareness events within the HFTD in 2022 to message power line-compatible species selection, and will be distributing trees in these events. SDG&E also plans to continue its engagement with tribal lands located in the HFTD to plant or provide trees associated with replanting/restoration activities.

- l) Please see response to k) above.

- m) Please see response to k) above. SDG&E has planted 23 trees in the Non-HFTD thus far in 2022.

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QUESTION 3

Please provide a geodatabase file including points for trees removed and trees planted in 2021, including the following attributes for each one:

- a) Spatial location
- b) Project ID
- c) Whether tree was planted or removed
- d) Genus of tree planted or removed
- e) Species of tree planted or removed

RESPONSE 3

SDG&E objects to the Question on the grounds set forth in General Objections Nos. 2, 3, 5, 6, and 8. Subject to the foregoing objections, SDG&E responds as follows:

- a) Please see documents titled, “CalPA DR WMP-12 Question 3 Removed.gdb”, and “CalPA DR WMP-12 Question 3 Planted.gdb.”
- b) Please see response for a)
- c) Please see response for a)
- d) Please see response for a). Please note, Vegetation Management’s tree inventory database does not currently identify trees by genus/species. Therefore, the file for ‘Removed’ trees only includes the common name. The file for ‘Planted’ trees is a separate database and does include genus/species.
- e) Please see response for d)

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END OF REQUEST